



Attn: Harbor Comments
U.S. EPA, 805 SW Broadway, Suite 500
Portland, OR 97205

Re: NINA Response to the EPA Portland Superfund Site Clean-up Plan

The Northwest Industrial Neighborhood Association (NINA) is an organization of over 500 businesses and approximately 18,000 employees. Our district includes the Guild's Lake Industrial Sanctuary, and encompasses an area from the Fremont Bridge/I-405 interchange to the St. John's Bridge, bounded by the Willamette River and St. Helen's Road/US 30. The majority of our businesses are engaged in manufacturing, warehousing and distribution, and commercial services.

Members of NINA have participated in various River Renaissance activities since the program's inception in 2001. The 2004 River Renaissance Strategy acknowledged the importance of the working harbor. The 2006 River Concept recognized that the North Reach would continue to provide Oregon with access to global markets and support the region's economy as a West Coast distribution hub and heavy industrial area.

Throughout the River Renaissance and River Plan processes, NINA has been particularly supportive of city efforts to create a unified set of policies and programs for the Willamette River, and we appreciate the economic and industrial land studies that have helped showcase the working waterfront.

Looking to the future, we are concerned about how businesses in Portland's harbor will be able to afford their obligations to the Superfund and still remain viable industrial operations. The EPA needs to weigh the options available to clean the river while keeping the sustainability of the area and its neighbors intact. Many of the neighborhood businesses and property owners did not contribute the Willamette River superfund issues but are concerned for the negative environmental, economic and productivity impact effects that an overly costly and extensive plan would have on our community. The loss of jobs and income, even temporarily; could lead to a major downturn or permanent loss of living wage jobs and income in these struggling financial times. We hope these concerns are taken into account by the EPA's work on our river and the NINA neighborhood.

Sincerely,

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